

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

BLACKROCK FINANCE, INC.,
50 Hudson Yards
New York, NY 10001,

Plaintiff,

Civ. A. No. 1:24-cv-1975

v.

ALADDINFXTRADES.COM,
ALADINTRADINGS.COM,
ALADINVESTMENT.COM,
BLACKROCK-ADVISORS.COM,
BLACKROCKALTERNATIVEINVESTMENTS.COM,
BLACKROCKASSET.NET,
BLACKROCKASSETMANAGEMENTS.COM,
BLACKROCKASSETSMGT.COM,
BLACKROCKBIZNET.NET,
BLACKROCK-BTC.NET,
BLACKROCKCLIENTS.COM,
BLACKROCKCPAS.COM,
BLACKROCKCPASGROUP.COM,
BLACKROCKCREDITSOLUTIONS.COM,
BLACKROCKFUND.ORG,
BLACKROCKFXPRO.COM,
BLACKROCKGROUPTHOLDINGS.COM,
BLACKROCKGROUPTRADING.COM,
BLACKROCKHEDGEFUNDS.COM,
BLACKROCKHOLDINGSINC.COM,
BLACKROCKHQ.COM,
BLACKROCKINDIA.NET,
BLACKROCKINVESTIMENTOS.COM,
BLACKROCKINVESTMENTGG.COM,
BLACKROCK-INVESTORSERVICES.COM,
BLACKROCKKLLC.COM,
BLACKROCKMANAGEMENTANDCONSULTING.COM,
BLACKROCKMONEYBOSS.COM,
BLACKROCKPREQUIN.COM,
BLACKROCKPRIVATEEQUITY.COM,
BLACKROCKPUMP.COM,
BLACKROCKREALESTATEFUND.COM,

BLACKROCKRISKMANAGEMENT.COM,
BLACKROCKSMANAGEMENT.COM,
BLACKROCKSOLUTION.NET,
BLACKROCK-USDT.COM,
BLACKROCKVENTURESGROUP.COM,
BLARCKROCK.COM,
CAPITALBLACKROCK.COM,
INVESTWITHBLACKROCK.COM,
JIOBLACKROCKFUND.COM,
JIOBLKAMC.COM,
JIOBLKBROKER.COM,
JIOBLKFUNDS.COM,
LEDGER-BLACKROCK-SUPPORT.COM, and
PROFITALADDIN.COM, Internet Domain Names,

Defendants.

COMPLAINT

Plaintiff BlackRock Finance, Inc. (“BlackRock”), through counsel, alleges as follows for its *in rem* Complaint against Defendants ALADDINFXTRADES.COM, ALADINTRADINGS.COM, ALADINVESTMENT.COM, BLACKROCK-ADVISORS.COM, BLACKROCKALTERNATIVEINVESTMENTS.COM, BLACKROCKASSET.NET, BLACKROCKASSETMANAGEMENTS.COM, BLACKROCKASSETSMGT.COM, BLACKROCKBIZNET.NET, BLACKROCK-BTC.NET, BLACKROCKCLIENTS.COM, BLACKROCKCPAS.COM, BLACKROCKCPASGROUP.COM, BLACKROCKCREDITSOLUTIONS.COM, BLACKROCKFUND.ORG, BLACKROCKFXPRO.COM, BLACKROCKGROUPHOLDINGS.COM, BLACKROCKGROUPTRADING.COM, BLACKROCKHEDGEFUNDS.COM, BLACKROCKHOLDINGSINC.COM, BLACKROCKHQ.COM, BLACKROCKINDIA.NET, BLACKROCKINVESTIMENTOS.COM, BLACKROCKINVESTMENTGG.COM, BLACKROCK-INVESTORSERVICES.COM, BLACKROCKKLLC.COM,

BLACKROCKMANAGEMENTANDCONSULTING.COM,
BLACKROCKMONEYBOSS.COM, BLACKROCKPREQUIN.COM,
BLACKROCKPRIVATEEQUITY.COM, BLACKROCKPUMP.COM,
BLACKROCKREALESTATEFUND.COM, BLACKROCKRISKMANAGEMENT.COM,
BLACKROCKSMANAGEMENT.COM, BLACKROCKSOLUTION.NET, BLACKROCK-
USDT.COM, BLACKROCKVENTURESGROUP.COM, BLARCKROCK.COM,
CAPITALBLACKROCK.COM, INVESTWITHBLACKROCK.COM,
JIOBLACKROCKFUND.COM, JIOBLKAMC.COM, JIOBLKBROKER.COM,
JIOBLKFUNDS.COM, LEDGER-BLACKROCK-SUPPORT.COM, and
PROFITALADDIN.COM (the “Defendant Domain Names”).

NATURE OF THE SUIT

1. This is an *in rem* action for cybersquatting under the Federal Anti-Cybersquatting Consumer Protection Act, 15 U.S.C. § 1125(d), and trademark infringement under the Lanham Act, 15 U.S.C. § 1114(1)(a).

2. The Plaintiff in this action, BlackRock Finance, Inc., is a long-standing and highly respected financial institution, with a strong reputation throughout the United States and internationally. BlackRock’s trademarks, including BLACKROCK, ALADDIN, and BLK, inform consumers that the goods and services offered under those marks emanate from BlackRock, and as a result, that those goods and services may be trusted with highly sensitive information and finances.

3. Bad actors are seeking to take advantage of that hard-earned public trust by cybersquatting on BlackRock’s marks, to mislead consumers about nonexistent associations with BlackRock, to the detriment of both BlackRock and the public at large. This action is part of an

ongoing effort to protect both BlackRock and its consumers from these dangerous and dishonest actors (an effort that includes two prior successful cybersquatting actions in this District, *BlackRock, Inc. v. Balckrock,.com et al.*, No. 1:22-cv-1002-TSE-JFA (E.D. Va. Sept. 6, 2022) and *BlackRock, Inc. v. 3BlackRock.com et al.*, No. 1:23-cv-1375-AJT-WEF (E.D. Va. June 25, 2024).

4. In the present case, BlackRock's invaluable rights in the distinctive marks BLACKROCK, ALADDIN, and BLK have been deliberately infringed through the bad faith registration, use, and/or trafficking of the Defendant Domain Names, which are confusingly similar to those marks, and by the use of the Defendant Domain Names to infringe BlackRock's trademark rights. BlackRock seeks an order transferring the offending domain names to it, to prevent ongoing consumer deception.

PARTIES

5. BlackRock Finance, Inc. is a corporation organized and existing under the laws of Delaware with a principal business address of 50 Hudson Yards, New York, NY 10001.

6. ALADDINFXTRADES.COM is an Internet domain name which, according to the domain registration records, is registered to an unknown individual or entity, whose identity is concealed through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 1. The domain wholly incorporates BlackRock's protected ALADDIN mark, with the addition of the abbreviation for the global marketplace for exchanging national currencies "forex," and the term "trades" which is descriptive of financial services related to those BlackRock offers.

7. ALADINTRADINGS.COM is an Internet domain name which, according to the domain registration records, is registered to an unknown individual or entity, whose identity is concealed through use of a privacy service. A copy of the domain name registration record is

attached as Exhibit 2. The domain incorporates a common misspelling of BlackRock's protected ALADDIN mark, with the addition of the term "tradings" which is descriptive of financial services related to those BlackRock offers.

8. ALADINVESTMENT.COM is an Internet domain name which, according to the domain registration records, is registered to an unknown individual or entity, whose identity is concealed through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 3. The domain incorporates a common misspelling of BlackRock's protected ALADDIN mark, with the addition of the term "investment" which is descriptive of financial services that BlackRock offers, or the domain could be interpreted as a portmanteau of these two terms that are closely associated with BlackRock and its services.

9. BLACKROCK-ADVISORS.COM is an Internet domain name which, according to the domain registration records, is registered to an unknown individual or entity, whose identity is concealed through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 4. The domain wholly incorporates BlackRock's protected BLACKROCK mark, with the addition of a hyphen and the generally descriptive term "advisors."

10. BLACKROCKALTERNATIVEINVESTMENTS.COM is an Internet domain name which, according to the domain registration records, is registered to an unknown individual or entity, whose identity is concealed through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 5. The domain wholly incorporates BlackRock's protected BLACKROCK mark, with the addition of the term "alternative investments" which is descriptive of financial services that BlackRock offers. Publicly available domain records indicate that the domain is configured for email, which is often used to further business impersonation fraud schemes.

11. BLACKROCKASSET.NET is an Internet domain name which, according to the domain registration records, is registered to an unknown individual or entity, whose identity is concealed through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 6. The domain wholly incorporates BlackRock's protected BLACKROCK mark, with the addition of the term "asset" which is descriptive of financial services related to those BlackRock offers.

12. BLACKROCKASSETMANAGEMENTS.COM is an Internet domain name which, according to the domain registration records, is registered to an individual by the name of Rotimi Ajayi, purportedly based in Nigeria. A copy of the domain name registration record is attached as Exhibit 7. The domain wholly incorporates BlackRock's protected BLACKROCK mark, with the addition of the term "asset managements" which is descriptive of financial services that BlackRock offers. The website to which the domain resolves hosts phishing attempts and/or other malware.

13. BLACKROCKASSETSMGT.COM is an Internet domain name which, according to the domain registration records, is registered to an unknown individual or entity, whose identity is concealed through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 8. The domain wholly incorporates BlackRock's protected BLACKROCK mark, with the addition of the term "assets" and an abbreviation for "management," which are descriptive of financial services that BlackRock offers.

14. BLACKROCKBIZNET.NET is an Internet domain name which, according to the domain registration records, is registered to an unknown individual or entity, whose identity is concealed through use of a privacy service. A copy of the domain name registration record is

attached as Exhibit 9. The domain wholly incorporates BlackRock's protected BLACKROCK mark, with the addition of abbreviations for the generally descriptive term "business network."

15. BLACKROCK-BTC.NET is an Internet domain name which, according to the domain registration records, is registered to an unknown individual or entity, whose identity is concealed through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 10. The domain wholly incorporates BlackRock's protected BLACKROCK mark, with the addition of a hyphen and the term "BTC," which is an abbreviation for the Bitcoin cryptocurrency, which related to the financial services that BlackRock offers. The website to which the domain resolves hosts phishing attempts and/or other malware.

16. BLACKROCKCLIENTS.COM is an Internet domain name which, according to the domain registration records, is registered to an unknown individual or entity, whose identity is concealed through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 11. The domain wholly incorporates BlackRock's protected BLACKROCK mark, with the addition of the generally descriptive term "clients."

17. BLACKROCKCPAS.COM is an Internet domain name which, according to the domain registration records, is registered to an unknown individual or entity; the registration records list redact the registrant name, repeat the second-level domain name as the registrant organization, and identify the registrant address generally as Alberta, Canada. A copy of the domain name registration record is attached as Exhibit 12. The domain wholly incorporates BlackRock's protected BLACKROCK mark, with the addition of the abbreviation of the term "certified public accountants," which is descriptive of financial services related to those that BlackRock offers. The domain redirects to BlackRock's legitimate website, suggesting a (false) association with BlackRock.

18. BLACKROCKCPASGROUP.COM is an Internet domain name which, according to the domain registration records, is registered to an unknown individual or entity, whose identity is concealed through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 13. The domain wholly incorporates BlackRock's protected BLACKROCK mark, with the addition of the generally descriptive term "group," and an abbreviation of the term "certified public accountants" which is descriptive of financial services related to those that BlackRock offers. The domain previously redirected to BlackRock's legitimate website, suggesting a (false) association with BlackRock.

19. BLACKROCKCREDITSOLUTIONS.COM is an Internet domain name which, according to the domain registration records, is registered to an unknown individual or entity, whose identity is concealed through use of a privacy service or other means to obfuscate registration information. A copy of the domain name registration record is attached as Exhibit 14. The domain wholly incorporates BlackRock's protected BLACKROCK mark, with the addition of the term "credit solutions" which is descriptive of financial services related to those that BlackRock offers.

20. BLACKROCKFUND.ORG is an Internet domain name which, according to the domain registration records, is registered to an unknown individual or entity, whose identity is concealed through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 15. The domain wholly incorporates BlackRock's protected BLACKROCK mark, with the addition of the term "fund" which is descriptive of financial services that BlackRock offers.

21. BLACKROCKFXPRO.COM is an Internet domain name which, according to the domain registration records, is registered to an unknown individual or entity, whose identity is concealed through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 16. The domain wholly incorporates BlackRock's protected BLACKROCK mark, with the addition of the abbreviation for the global marketplace for exchanging national currencies "forex," and the abbreviation for the generally descriptive term "professional."

22. BLACKROCKGROUPTHOLDINGS.COM is an Internet domain name which, according to the domain registration records, is registered to an unknown individual or entity, whose identity is concealed through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 17. The domain wholly incorporates BlackRock's protected BLACKROCK mark, with the addition of the term "group holdings" which is descriptive of financial services related to those that BlackRock offers.

23. BLACKROCKGROUPTRADING.COM is an Internet domain name which, according to the domain registration records, is registered to an unknown individual or entity, whose identity is concealed through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 18. The domain wholly incorporates BlackRock's protected BLACKROCK mark, with the addition of the term "group trading" which is descriptive of financial services related to those that BlackRock offers.

24. BLACKROCKHEDGEFUNDS.COM is an Internet domain name which, according to the domain registration records, is registered to an unknown individual or entity, whose identity is concealed through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 19. The domain wholly incorporates BlackRock's

protected BLACKROCK mark, with the addition of the term “hedge funds” which is descriptive of financial services related to those that BlackRock offers.

25. BLACKROCKHOLDINGSINC.COM is an Internet domain name which, according to the domain registration records, is registered to an unknown individual or entity, whose identity is concealed through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 20. The domain wholly incorporates BlackRock’s protected BLACKROCK mark, with the addition of the business entity descriptor “Inc.” and the term “holdings” which is descriptive of financial services related to those that BlackRock offers. The website to which the domain resolves hosts pay-per-click advertising for investment services related to those that BlackRock offers.

26. BLACKROCKHQ.COM is an Internet domain name which, according to the domain registration records, is registered to an unknown individual or entity, whose identity is concealed through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 21. The domain wholly incorporates BlackRock’s protected BLACKROCK mark, with the addition of the abbreviation for the generally descriptive term “headquarters.”

27. BLACKROCKINDIA.NET is an Internet domain name which, according to the domain registration records, is registered to an unknown individual or entity, whose identity is concealed through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 22. The domain wholly incorporates BlackRock’s protected BLACKROCK mark, with the addition of the geographically descriptive term “India.” This domain was used as part of a business impersonation scam, in which the registrant or someone acting in concert with the registrant set up fake investment platforms and financial education courses that misled consumers about an affiliation with BlackRock, resulting in at least one consumer being defrauded.

28. BLACKROCKINVESTIMENTOS.COM is an Internet domain name which, according to the domain registration records, is registered to an unknown individual or entity, whose identity is concealed through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 23. The domain wholly incorporates BlackRock's protected BLACKROCK mark, with the addition of the Spanish translation of the term "investments" which is descriptive of financial services that BlackRock offers.

29. BLACKROCKINVESTMENTGG.COM is an Internet domain name which, according to the domain registration records, is registered to an unknown individual or entity, whose identity is concealed through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 24. The domain wholly incorporates BlackRock's protected BLACKROCK mark, with the addition of the term "investment" which is descriptive of financial services that BlackRock offers, and the apparently random lettering "GG."

30. BLACKROCK-INVESTORSERVICES.COM is an Internet domain name which, according to the domain registration records, is registered to an unknown individual or entity, whose identity is concealed through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 25. The domain wholly incorporates BlackRock's protected BLACKROCK mark, with the addition of a hyphen and the term "investor services" which is descriptive of financial services that BlackRock offers.

31. BLACKROCKKLLC.COM is an Internet domain name which, according to the domain registration records, is registered to an unknown individual or entity, whose identity is concealed through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 26. The domain wholly incorporates BlackRock's protected BLACKROCK mark, with the addition of the letter "k" and the business entity descriptor "LLC."

32. BLACKROCKMANAGEMENTANDCONSULTING.COM is an Internet domain name which, according to the domain registration records, is registered to an unknown individual or entity, whose identity is concealed through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 27. The domain wholly incorporates BlackRock's protected BLACKROCK mark, with the addition of the phrase "management and consulting," which is descriptive of financial services related to those that BlackRock offers. The website to which the domain resolves hosts pay-per-click advertising for investment services of the type BlackRock offers, including links using the BLACKROCK mark without authorization.

33. BLACKROCKMONEYBOSS.COM is an Internet domain name which, according to the domain registration records, is registered to an individual purportedly named Smith Jack Jack, based in "Manytoba" Canada. A copy of the domain name registration record is attached as Exhibit 28. The domain wholly incorporates BlackRock's protected BLACKROCK mark, with the addition of the generally descriptive and laudatory term "boss," and the term "money" which is descriptive of financial services related to those that BlackRock offers.

34. BLACKROCKPREQUIN.COM is an Internet domain name which, according to the domain registration records, is registered to an unknown individual or entity, whose identity is concealed through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 29. The domain wholly incorporates BlackRock's protected BLACKROCK mark, with the addition of a common misspelling of "Preqin," which refers to an entity that BlackRock recently announced its intent to acquire. The domain is currently listed for re-sale for \$2250, which is far more than the domain's intrinsic value.

35. BLACKROCKPRIVATEEQUITY.COM is an Internet domain name which, according to the domain registration records, is registered to an unknown individual or entity,

whose identity is concealed through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 30. The domain wholly incorporates BlackRock's protected BLACKROCK mark, with the addition of the term "private equity" which is descriptive of financial services related to those that BlackRock offers.

36. BLACKROCKPUMP.COM is an Internet domain name which, according to the domain registration records, is registered to an unknown individual or entity, whose identity is concealed through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 31. The domain wholly incorporates BlackRock's protected BLACKROCK mark, with the addition of the term "pump," which is often used in the context of stock trading and is descriptive of financial services related to those that BlackRock offers.

37. BLACKROCKREALESTATEFUND.COM is an Internet domain name which, according to the domain registration records, is registered to an unknown individual or entity, whose identity is concealed through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 32. The domain wholly incorporates BlackRock's protected BLACKROCK mark, with the addition of the term "real estate fund" which is descriptive of financial services that BlackRock offers.

38. BLACKROCKRISKMANAGEMENT.COM is an Internet domain name which, according to the domain registration records, is registered to an unknown individual or entity, whose identity is concealed through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 33. The domain wholly incorporates BlackRock's protected BLACKROCK mark, with the addition of the term "risk management" which is descriptive of financial services that BlackRock offers. The domain is currently listed for re-sale through GoDaddy.

39. BLACKROCKSMANAGEMENT.COM is an Internet domain name which, according to the domain registration records, is registered to an unknown individual or entity, whose identity is concealed through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 34. The domain wholly incorporates BlackRock's protected BLACKROCK mark, pluralized, with the addition of the term "management" which is descriptive of financial services related to those that BlackRock offers. The website to which the domain resolves hosts pay-per-click advertising for investment services of the type BlackRock offers, including links using the BLACKROCK mark without authorization.

40. BLACKROCKSOLUTION.NET is an Internet domain name which, according to the domain registration records, is registered to an unknown individual or entity, whose identity is concealed through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 35. The domain wholly incorporates BlackRock's protected BLACKROCK mark, with the addition of the generally descriptive term "solution."

41. BLACKROCK-USDT.COM is an Internet domain name which, according to the domain registration records, is registered to an unknown individual or entity, whose identity is concealed through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 36. The domain wholly incorporates BlackRock's protected BLACKROCK mark, with the addition of the abbreviation for the Tether cryptocurrency stablecoin, which is related to the financial services BlackRock offers.

42. BLACKROCKVENTURESGROUP.COM is an Internet domain name which, according to the domain registration records, is registered to an unknown individual or entity, whose identity is concealed through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 37. The domain wholly incorporates BlackRock's

protected BLACKROCK mark, with the addition of the generally descriptive term “group” and the term “ventures” which is descriptive of financial services related to those that BlackRock offers.

43. BLARCKROCK.COM is an Internet domain name which, according to the domain registration records, is registered to an unknown individual or entity, whose identity is concealed through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 38. The domain consists entirely of a common misspelling of BlackRock’s protected BLACKROCK mark. This domain was used as part of a business impersonation scam, in which the registrant or someone acting in concert with the registrant attempted to mislead a client of BlackRock by impersonating a BlackRock employee, in an attempt to misdirect millions of dollars intended for BlackRock.

44. CAPITALBLACKROCK.COM is an Internet domain name which, according to the domain registration records, is registered to an organization called MY Foods, S.R.O., purportedly based in South Korea. A copy of the domain name registration record is attached as Exhibit 39. The domain wholly incorporates BlackRock’s protected BLACKROCK mark, with the addition of the term “capital” which is descriptive of financial services related to those that BlackRock offers.

45. INVESTWITHBLACKROCK.COM is an Internet domain name which, according to the domain registration records, is registered to an unknown individual or entity, whose identity is concealed through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 40. The domain wholly incorporates BlackRock’s protected BLACKROCK mark, with the addition of the phrase “invest with” which is descriptive of financial services related to those that BlackRock offers.

46. JIOBLACKROCKFUND.COM is an Internet domain name which, according to the domain registration records, is registered to an unknown individual or entity, whose identity is concealed through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 41. The domain wholly incorporates BlackRock's protected BLACKROCK mark, with the addition of "Jio" which refers to an entity with which BlackRock has a joint venture, and the term "fund" which is descriptive of financial services that BlackRock offers. The domain previously resolved to a website hosting pay-per-click advertising for financial and investment services.

47. JIOBLKAMC.COM is an Internet domain name which, according to the domain registration records, is registered to an unknown individual or entity, whose identity is concealed through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 42. The domain wholly incorporates BlackRock's protected BLK mark, with the addition of "Jio" which refers to an entity with which BlackRock has a joint venture, and the abbreviation for "asset management company" which is descriptive of financial services that BlackRock offers. The website to which the domain resolves hosts pay-per-click advertising.

48. JIOBLKBROKER.COM is an Internet domain name which, according to the domain registration records, is registered to an unknown individual or entity, whose identity is concealed through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 43. The domain wholly incorporates BlackRock's protected BLK mark, with the addition of "Jio" which refers to an entity with which BlackRock has a joint venture, and "broker" which is descriptive of financial services related to those that BlackRock offers. The website to which the domain resolves hosts pay-per-click advertising for investment services related to those BlackRock offers.

49. JIOBLKFUNDS.COM is an Internet domain name which, according to the domain registration records, is registered to an individual named Mallela Krishna, purportedly based in India. A copy of the domain name registration record is attached as Exhibit 44. The domain wholly incorporates BlackRock's protected BLK mark, with the addition of "Jio" which refers to an entity with which BlackRock has a joint venture, and "funds" which is descriptive of financial services that BlackRock offers.

50. LEDGER-BLACKROCK-SUPPORT.COM is an Internet domain name which, according to the domain registration records, is registered to an unknown individual or entity, whose identity is concealed through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 45. The domain wholly incorporates BlackRock's protected BLACKROCK mark, with the addition of hyphens, the generically descriptive term "support," and the descriptive term "ledger" which refers to financial services related to those that BlackRock offers. The website to which the domain resolves hosts phishing attempts and/or other malware.

51. PROFITALADDIN.COM is an Internet domain name which, according to the domain registration records, is registered to an unknown individual or entity, whose identity is concealed through use of a privacy service. A copy of the domain name registration record is attached as Exhibit 46. The domain wholly incorporates BlackRock's protected ALADDIN mark, with the addition of the term "profit" which is descriptive of financial services related to those that BlackRock offers.

JURISDICTION, VENUE AND JOINDER

52. This is a civil action for federal cybersquatting in violation of the Anti-Cybersquatting Consumer Protection Act, 15 U.S.C. § 1125(d), and for trademark infringement

under the Lanham Act, 15 U.S.C. § 1114(1)(a).

53. This Court has original jurisdiction under 15 U.S.C. § 1121(a) and 28 U.S.C. §§ 1331 and 1338(a).

54. This Court has *in rem* jurisdiction over the Defendant Domain Names pursuant to 15 U.S.C. § 1125(d)(2)(A). *In rem* jurisdiction is appropriate under 15 U.S.C. § 1125(d)(2)(A)(ii) because there is either no registrant field in the registration record for the Defendant Domain Names, or where there is a registrant field, that field reflects a privacy service, an apparently fictitious person/entity, and/or an individual residing outside the United States, and therefore BlackRock cannot obtain *in personam* jurisdiction over a person who would have been a defendant in a civil action under 15 U.S.C. § 1125(d)(1)(A) and/or BlackRock, despite its due diligence in accordance with 15 U.S.C. § 1125(d)(2)(A)(ii)(II), has been unable to find a person who would have been a defendant in a civil action under 15 U.S.C. § 1125(d)(1)(A).

55. Pursuant to 15 U.S.C. § 1125(d)(2)(A)(ii)(II)(aa), BlackRock has given notice of the violations of its rights, and its intent to proceed *in rem*, to the contact addresses set forth in the registration records for each of the Defendant Domain Names.

56. Venue is proper in this District pursuant to 15 U.S.C. § 1125(d)(2)(C) in that the registry operator the .COM and .NET domain registries, VeriSign, Inc., and the registry operator for the .ORG domain registry, Public Interest Registry, are situated in this judicial district, and the Defendant Domain Names are all .COM, .NET, and .ORG domain names.

57. Joinder of the Defendant Domain Names is proper under Fed. R. Civ. P. 20(a)(2) and/or 21 in that the *in rem* cybersquatting and trademark infringement claims set forth herein appear to arise out of the same series of transactions and the same questions of law are common to all of the Defendant Domain Names.

BLACKROCK'S RIGHTS

58. BlackRock was founded in 1988 as an asset management firm. Since its founding, BlackRock has grown into the world's largest publicly traded investment management firm, with over 19,000 employees in more than 36 countries, and over \$11 trillion in assets under its management.

59. BlackRock is a publicly traded Fortune 500 company (NYSE:BLK). BlackRock owns and controls numerous subsidiary companies that share the BlackRock name (all such wholly owned subsidiaries are included in the term "BlackRock" as used herein).

60. BlackRock has continuously used the mark BLACKROCK to promote its services since its founding. Under the mark, BlackRock offers an array of investment, advisory, and risk management services to clients ranging from private consumers to large financial entities, and including governments, companies, foundations, and millions of individuals.

61. BlackRock manages numerous well-known funds under the BLACKROCK mark, including, *e.g.*, the BlackRock Income Fund; BlackRock Innovation and Growth Trust; BlackRock Capital Allocation Trust; BlackRock Credit Allocation Income Trust; BlackRock Future Tech ETF; BlackRock U.S. Carbon Transition Readiness ETF; BlackRock Future Health ETF; BlackRock Utilities, Infrastructure, & Power Opportunities Trust; BlackRock Defensive Advantage International Fund; BlackRock GA Dynamic Equity Fund; BlackRock College Advantage 529; BlackRock China A Opportunities Fund; BlackRock Sustainable Emerging Markets Flexible Bond Fund; BlackRock High Yield Muni Income Bond ETF; BlackRock Large Cap Focus Growth Fund, Inc.; BlackRock Retirement Income 2040 Fund; and BlackRock Hedge Fund Guided Portfolio Solution.

62. BlackRock has expended significant time, money, and effort in promoting and

marketing its services offered under the BLACKROCK mark, through substantial and ongoing business activities across all major industry sectors in the United States and across the globe.

63. The BLACKROCK mark has a premier presence in the financial industry. BlackRock is referenced extensively throughout public company resources, trading outlets, U.S. stock exchanges, and regulatory authority databases, *e.g.*, the Securities and Exchange Commission, Financial Industry Regulatory Authority, and others. Further, BlackRock is frequently featured in major news outlets, which has furthered the worldwide reputation of the BLACKROCK mark as a single authority and source of market information across a variety of industry sectors.

64. BlackRock is regularly included in various “top brands” lists, including Fortune, Forbes, Brand Finance, and Broadridge’s “Best-Performing Fund Brands Globally.”

65. BlackRock (under its former name BlackRock, Inc.) registered the domain name BlackRock.com on November 26, 1997. Since that date, BlackRock has continuously used the domain name to host a website that promotes BlackRock’s asset management services, and provides investment insights, tools, and education to consumers.

66. BlackRock (under its former name BlackRock, Inc.) has acquired numerous other domain names that include the BLACKROCK mark, including, but not limited to:

- blackrock-financial-services.us;
- blackrockglobalinvestors.us;
- blackrockfinancial.us;
- blackrockishares.us;
- blackrockpreparedminds.us;
- blackrocksolutions.us;
- blackrock-inc.com;
- blackrockproperty.us;
- blackrockglobalinvestors.co.uk;
- blackrockfunds.us;
- blackrockadvisor.us;
- blackrockwmfunds.co.uk;

blackrockent.co.uk;
blackrockinvestorpack.co.uk;
blackrock.co.uk;
blackrockpreparedminds.cn;
blackrockinternational.com.cn;
blackrockinternational.cn;
blackrockglobalinvestors.cn;
blackrock.com.cn;
blackrockishares.cn;
blackrock.cn;
blackrock-financial.us;
blackrockfinancialservices.us;
blackrockfunding.us; and
blackrockbrokage.us.

BlackRock uses some of these domains to redirect to its main website, or to country-specific sites, but it holds many domains as a defensive measure intended to protect consumers by limiting cybersquatting of domain name registrations.

67. Consumers have come to distinguish and recognize the legitimacy of BlackRock's services as a result of the use and widespread promotion of the BLACKROCK mark.

68. Given BlackRock's stellar reputation, its market-leading asset management services, and the fame and recognition of the BLACKROCK mark, malicious third parties attempt to misuse the BLACKROCK mark to confuse, mislead, and/or deceive consumers. To protect both its consumers and its valuable mark, BlackRock has engaged in significant enforcement efforts to shut down scams and schemes using the BLACKROCK mark without authorization. Its efforts include defensive registration of the aforementioned domain names, trademark civil actions (including cybersquatting actions *BlackRock, Inc. v. 3BlackRock.com et al.*, No. 1:23-cv-1375-AJT-WEF (E.D. Va. June 25, 2024) and *BlackRock, Inc. v. Balckrock,.com et al.*, No. 1:22-cv-1002-TSE-JFA (E.D. Va. Sept. 6, 2022)), administrative proceedings under the Uniform Domain-Name Dispute-Resolution Policy, use of domain policing and trademark monitoring platforms, and take-down notices.

69. Based on BlackRock's extensive use and promotion of the BLACKROCK mark for several decades, and the recognition and goodwill the mark has achieved in the eyes of the consuming public, the BLACKROCK mark is distinctive and/or famous, and is entitled to broad common law trademark rights.

70. The Defendant Domain Names represent unauthorized colorable imitations of the BLACKROCK mark, which further demonstrates that the BLACKROCK mark has acquired distinctiveness and was famous and/or distinctive prior to the time of registration of the Defendant Domain Names.

71. In addition to its common law trademark rights, BlackRock owns numerous trademark registrations in BLACKROCK formative marks throughout the world, including registrations on the Principal Trademark Register of the U.S. Patent and Trademark Office. These registrations include:

- Reg. No. 2417737, BLACKROCK, for "investment management services; investment advice; risk management; stock brokerage services, namely, the sales, marketing and distribution of investment company shares; mutual fund brokerage services; mutual fund administration;"
- Reg. No. 2645470, BLACKROCK SOLUTIONS, for "financial services, namely, providing risk management services, financial management services, securities trading, insurance consultation, investment management and investment advisory services;" and "temporary use of on-line non-downloadable computer software for use by others in the evaluation, analysis, and risk assessment of financial instruments;"
- Reg. No. 3425495, BLACKROCK (stylized), for "Providing business and market research services to individual and institutional financial investors and financial professionals; business management consultation;" and "Investment management services; investment advice; financial risk management; stock brokerage services in the field of investment company shares; mutual fund brokerage services; mutual fund investment services; mutual fund distribution services; financial asset management; financial asset evaluation; investment services, namely, management and brokerage in the fields of stocks, bonds, options, commodities, futures and other securities, and the investment of funds of others; investment advisory services; financial investment research; equity capital investment; financial investment in the field of real estate; fiscal assessments and evaluations; financial management of real estate and mutual fund investment trusts; financial research; preparation of financial reports for others and financial analysis related thereto; providing

financial information in the field of investment opportunities and financial analysis; investment management and distribution of shares of investment companies or other pooled investment vehicles, namely, of collateralized debt obligations, collateralized loan obligations, mutual funds, hedge funds and variable insurance funds; online financial services, namely, investment fund transfer and transaction services, financial planning and financial research; financial management and financial planning;”

- Reg. No. 3544707, BLACKROCK, for “providing information and analysis relating to economic market data; providing business development information and advice to financial professionals; business advice and information; market analysis;” and “providing information and analysis relating to financial investments; financial investment data;”
- Reg. No. 3592375, BLACKROCK ALTERNATIVE ADVISORS, for “providing financial management services, including investment management services; investment advice; financial investment in the field of securities and other financial instruments and investments in all manner of tangible assets; financial research and financial analysis; financial risk management;”
- Reg. No. 5160061, BLACKROCK, for “Computer software and mobile applications for use by others in rendering financial services, namely, software for collecting, analyzing, organizing, storing and transmitting data and information in the fields of financial risk management, financial management and investment management; computer software and mobile applications used in connection with financial services, namely, software for collecting, analyzing, organizing, storing and transmitting data and information in the fields of personal financial planning, personal financial management, personal investment management, and retirement planning;” and “Providing temporary use of on-line non-downloadable computer software, web applications, and computer software platforms in the field of financial services, namely, risk management, financial information, financial management, securities trading, investment management services, and retirement planning;”
- Reg. No. 5965157, BLACKROCK (stylized), for “Computer software and mobile applications for use by others in rendering financial services, namely, downloadable or recorded software for collecting, analyzing, organizing, storing and transmitting data and information in the fields of financial risk management, financial management and investment management; downloadable or recorded computer software and mobile applications used in connection with financial services, namely, software for collecting, analyzing, organizing, storing and transmitting data and information in the fields of personal financial planning, personal financial management, personal investment management, and retirement planning;” “Providing information and analysis relating to economic market data; providing and updating a financial index; providing financial indices based on selected groups of securities; providing and updating a financial index of securities values and classification, analysis, and reporting thereof; providing business development information and advice to financial professionals; business advice and information; market analysis; compiling financial, securities, stock exchange, trade and quote, index value and other financial market information for business purposes; analyzing and compiling data for measuring the performance of financial markets;” “Investment

management; investment advice; financial risk management; financial investment brokerage services; financial planning and investment advisory services; financial and investment services, namely, management and brokerage in the fields of stocks, bonds, options, commodities, futures and other securities, and the investment of funds of others; financial services, namely, operation and management of hedge funds, commodity pools and other collective investment vehicles, and trading for others of securities, options, futures, derivatives, debt instruments and commodities; financial administration of stock exchange trading of shares and other financial securities in financial markets; monitoring financial markets for investment purposes; financial investment analysis and stock research; providing information and advice in the field of finance, financial investments, financial valuations, and the financial aspects of retirement; providing information and research in the field of finance and financial investments;” and “Providing temporary use of on-line non-downloadable computer software, web applications, and on-line non-downloadable computer software platforms for use in the field of financial services, namely, for risk management, providing financial information, financial management, securities trading, investment management services, and retirement planning;” and

- Reg. No. 6151287, BLACKROCK, for “Educational services, namely, providing workshops, classes, seminars, and conferences in the fields of business, finance, securities trading, financial markets, financial investment, investment management, financial planning, retirement planning, and risk management; educational and entertainment services, namely, providing podcasts in the fields of business, finance, securities trading, financial markets, financial investment, investment management, financial planning, retirement planning, and risk management.”

Copies of these registrations are attached hereto as Exhibit 47. These registrations are *prima facie* evidence of the validity of the marks, of BlackRock’s ownership of the marks, and of BlackRock’s exclusive right to use the marks in U.S. commerce.

72. Additionally, Reg. Nos. 2417737, 2645470, 3425495, 3544707, 3592375, and 5160061 have achieved incontestable status. BlackRock’s incontestable registrations are *conclusive* evidence of the validity of the marks, of BlackRock’s ownership of the marks, and of BlackRock’s exclusive right to use the mark in U.S. commerce.

73. In addition to its strong, long-standing rights in the BLACKROCK mark, BlackRock has established trademark rights in a number of other marks that it uses to market its financial goods and services. BlackRock owns common law trademark rights in the marks ALADDIN and BLK by virtue of its continuous use of the marks in U.S. commerce in association

with financial services.

74. At least as early as 1996, BlackRock began using the mark ALADDIN to market financial services and computer software facilitating those services and has been using the mark continuously since that date. The particular services offered under the ALADDIN mark relate to a platform for investment management. The ALADDIN services are featured prominently on BlackRock's website and have a dedicated subpage at [BlackRock.com/Aladdin](https://www.blackrock.com/aladdin). At present, the ALADDIN services are used by approximately 100,000 investment professionals worldwide.

75. The ALADDIN services have received significant publicity, including industry awards. In 2022 alone, the ALADDIN service won the Insurance Asset Risk Americas award for insurance asset risk technology provider of the year; the Central Banking Awards' risk management technology provider of the year; and Buy-Side Technology's award for best buy-side investment book of record platform.

76. BlackRock has successfully registered the mark ALADDIN on the U.S. Patent and Trademark Office's Principal Register, as follows:

- Reg. No. 2639018, ALADDIN, for "Financial services, namely, providing risk management services, financial management services, and securities trading;" "Temporary use of on-line non-downloadable computer software for use by others in providing financial services, namely, providing risk management, financial information, financial management, securities trading and investment management services;" and
- Reg. No. 5829287, ALADDIN, for "Computer software and mobile applications for use by others in rendering financial services, namely, software for collecting, analyzing, organizing, storing and transmitting data and information in the fields of financial risk management, financial management and investment management; computer software and mobile applications used in connection with financial services, namely, software for collecting, analyzing, organizing, storing and transmitting data and information in the fields of personal financial planning, personal financial management, personal investment management, and retirement planning."

Copies of these registrations are attached hereto as Exhibit 48. These registrations are *prima facie* evidence of the validity of the marks, of BlackRock's ownership of the marks, and of BlackRock's exclusive right to use the marks in U.S. commerce.

77. Additionally, Reg. No. 2639018 has achieved incontestable status, which renders it *conclusive* evidence of the validity of the mark, of BlackRock's ownership of the mark, and of BlackRock's exclusive right to use the mark in U.S. commerce.

78. BlackRock has used the BLK mark continuously in commerce since at least 2012. In addition to being BlackRock's stock symbol, the mark has been used to promote both the general financial services and BlackRock's mobile applications specifically.

79. BlackRock has successfully registered the BLK on the U.S. Patent and Trademark Office's Principal Register, as follows:

- Reg. No. 4343622, BLK, for "providing information and analysis relating to economic market data; providing business and market research services to individual and institutional financial investors and financial professionals; business management consultation; market analysis;" "investment management services; investment advice; financial risk management; stock brokerage services in the field of investment company shares; mutual fund brokerage services; mutual fund investment services; mutual fund distribution services; financial asset management; financial asset evaluation; investment services, namely, management and brokerage in the fields of stocks, bonds, options, commodities, futures and other securities, and the investment of funds of others; investment advisory services; financial investment research; equity capital investment; financial investment in the field of real estate; fiscal assessments and evaluations; financial management of real estate and mutual fund investment trusts; financial research; preparation of financial reports for others and financial analysis related thereto; providing financial information in the field of investment opportunities and financial analysis; investment management and distribution of shares of investment companies or other pooled investment vehicles, namely, of collateralized debt obligations, collateralized loan obligations, mutual funds, hedge funds and variable insurance funds; online financial services, namely, investment fund transfer and transaction services, financial planning and financial research; financial management and financial planning; distribution and administration of exchange-traded funds."

A copy of this registration is attached hereto as Exhibit 49. This registration is *prima facie* evidence of the validity of the marks, of BlackRock's ownership of the marks, and of BlackRock's exclusive

right to use the marks in U.S. commerce. The common law and statutory rights in the BLK, ALADDIN, and BLACKROCK marks described above are referred to collectively herein as the “BlackRock Marks.”

UNLAWFUL REGISTRATION AND/OR USE OF THE DOMAIN NAMES

80. BlackRock has engaged in significant efforts to protect consumers by, *inter alia*, implementing a domain and trademark policing program, defensively registering domain names, and by pursuing the disabling of domain names that are being used to confuse and mislead consumers.

81. Where necessary, BlackRock also has pursued transfer of domain names that are confusingly similar to its marks and were registered and/or used in bad faith, including through numerous successful actions under the Uniform Domain-Name Dispute-Resolution Policy and the Anti-Cybersquatting Consumer Protection Act (e.g., *BlackRock, Inc. v. 3BlackRock.com et al.*, No. 1:23-cv-1375-AJT-WEF (E.D. Va. June 25, 2024); *BlackRock, Inc. v. Balckrock,.com et al.*, No. 1:22-cv-1002-TSE-JFA (E.D. Va. Sept. 6, 2022)).

82. The Defendant Domain Names all reflect either wholesale adoptions or typographical errors of the BlackRock Marks. Where the domains include other elements, those elements are either nondistinctive (e.g., random letters or numbers), descriptive terms that relate to BlackRock’s services (e.g., “trades,” “asset,” “capital,” “fund,” “investment”), or references to entities associated with BlackRock (Jio and Preqin).

83. Upon information and belief, the Defendant Domain Names were registered for the purpose of, *inter alia*, obtaining Internet visitors when such visitors were attempting to reach BlackRock’s website.

84. Numerous Defendant Domain Names have been configured to display pay-per-

click advertisements related to BlackRock, to download malware or bloatware, for email service that can be used to mislead consumers, and/or to advertise themselves for re-sale to leverage the strength of the BlackRock Marks to garner a higher sale price.

85. For those Defendant Domain Names engaged in pay-per-click advertising, upon information and belief, the registrant(s) of the Defendant Domain Names receive compensation when Internet visitors, who were attempting to reach BlackRock's website, click on a link provided by a Defendant Domain Name to a third-party website and/or when the Internet visitors are automatically redirected by a Defendant Domain Name to a third-party website for a sales solicitation.

86. For those Defendant Domain Names engaged in distribution of malware, upon information and belief, the registrant(s) of the Defendant Domain Names receive compensation when Internet visitors, often unknowingly, download and install a computer virus from a website displayed at the Defendant Domain Names.

87. For those Defendant Domain Names configured for email service, upon information and belief, the registrant(s) of the Defendant Domain Names have configured the Defendant Domain Names to be used to send email for the purpose of unlawful impersonation of BlackRock. BlackRock is aware that at least two of the Defendant Domain Names have been used as part of business impersonation scams: BLACKROCKINDIA.NET and BLARCKROCK.COM.

88. With respect to the BLARCKROCK.COM domain, the domain registrant and/or an individual acting in concert with the registrant used an email address emanating from the domain name to misrepresent him/herself as a BlackRock employee to BlackRock's clients. The fraudster sought to misdirect payments intended for BlackRock, by directing BlackRock's clients to send future wire payments to accounts that had no association with BlackRock. If the scheme

had been successful, the fraudster could have stolen several million dollars from BlackRock's clients. On information and belief, other Defendant Domain Names are being used or were registered with the intent to be used for similar fraudulent schemes.

89. With respect to BLACKROCKINDIA.NET, the domain registrant or an individual acting in concert with the registrant used the domain to set up a website and social media accounts posing as a trading platform. At least one consumer lost money when he "invested" through the fraudulent website, falsely believing it to be affiliated with BlackRock. On information and belief, other Defendant Domain Names are being used or were registered with the intent to be used for similar fraudulent schemes.

90. The aforementioned use of the BlackRock Marks within the Defendant Domain Names and/or associated websites is without authorization from BlackRock.

91. Upon information and belief, the Defendant Domain Names do not reflect the legal name of the registrant(s) of the Defendant Domain Names.

92. Upon information and belief, the registrant(s) of the Defendant Domain Names have not engaged in bona fide noncommercial or fair use of the BlackRock Marks in a website accessible under the Defendant Domain Names.

93. The websites displayed by the registrant(s) of the Defendant Domain Names are likely to be confused with BlackRock's legitimate online locations, such as at BlackRock.com.

94. Upon information and belief, the registrant(s) of the Defendant Domain Names registered the Defendant Domain Names with intent to divert consumers away from BlackRock's online locations, such as at BlackRock.com, for commercial gain, by creating a likelihood of confusion as to the source, sponsorship, affiliation or endorsement of the Defendant Domain Names and the sites displayed through use of the Defendant Domain Names.

95. Upon information and belief, the registrant(s) of certain of the Defendant Domain Names provided material and misleading false contact information when applying for and maintaining the registration of the Defendant Domain Names in that the person or entity identified as the registrant of the Defendant Domain Names is not the true owner of the Domain Names.

96. The registrant(s) of certain of the Defendant Domain Names use services to conceal the identity of the true owner(s) of the domain name, by either concealing all information or providing so limited information that identification of the registrant is not possible.

97. Upon information and belief, if the Defendant Domain Names were registered by different people or entities, the registrants of the Defendant Domain Names acted in concert given that the Defendant Domain Names misuse the BlackRock Marks in similar ways, and groups of Defendant Domain Names were registered and/or re-registered in close temporal proximity, have been registered with the same registrar, and/or resolve to reflect similar unlawful content. *See* Exs. 1-46.

COUNT ONE:
(Violation of the Federal Anti-Cybersquatting Consumer Protection Act)

98. BlackRock repeats and realleges each and every allegation set forth in the foregoing paragraphs, as though fully set forth herein.

99. The BlackRock Marks are famous and/or distinctive and were famous and/or distinctive prior to the time of registration of the Defendant Domain Names.

The aforesaid acts by the registrant(s) of the Defendant Domain Names constitute registration, maintenance, trafficking in, and/or use of domain names that are confusingly similar to the BlackRock Marks, with bad faith intent to profit therefrom.

100. In light of the registrants' concealment of the identities of the true owners of the Defendant Domain Names, use of fictitious registrant names, and/or the registrants' location

outside the United States, BlackRock is not able to obtain *in personam* jurisdiction over the registrant(s) of the Defendant Domain Names or any other person who would have been a defendant in a civil action under 15 U.S.C. § 1125(d)(1)(A) or, alternatively, BlackRock, despite its due diligence pursuant to 15 U.S.C. § 1125(d)(2)(A)(ii)(II), has been unable to find a person who would have been a defendant in a civil action under 15 U.S.C. § 1125(d)(1)(A).

101. The aforesaid acts by the registrant(s) of the Domain Names constitute unlawful cyberpiracy in violation of the Anti-Cybersquatting Consumer Protection Act, 15 U.S.C. § 1125(d)(1).

102. The aforesaid acts have caused, and are causing, great and irreparable harm to BlackRock and the public. The harm to the public includes the potential for fraud stemming from these domains that is intended to mislead consumers into assuming an association with BlackRock, and resultant damage to consumers' trust in and ability to confidently access financial institutions. The harm to BlackRock includes harm to the value and goodwill associated with the BlackRock Marks that money cannot compensate. Unless permanently restrained and enjoined by this Court, said irreparable harm will continue. Thus, pursuant to 15 U.S.C. § 1125(d)(2)(D)(i), BlackRock is entitled to an order directing the current registrars of the Defendant Domain Names to be changed by the registries to BlackRock's registrar of choice and directing the registrant(s) to be changed to BlackRock.

COUNT TWO:
(In-Rem Trademark Infringement)

103. BlackRock repeats and realleges each and every allegation set forth in the foregoing paragraphs, as though fully set forth herein.

104. At the time the Defendant Domain Names were registered and/or used, BlackRock possessed valid federal trademark rights in the BlackRock Marks.

105. In light of the registrants' concealment of the identities of the true owners of the Defendant Domain Names and/or the registrants' location outside the United States, BlackRock is not able to obtain *in personam* jurisdiction over the registrant(s) of the Defendant Domain Names or any other person who would have been a defendant in a civil action under 15 U.S.C. § 1125(d)(1)(A) or, alternatively, BlackRock, despite its due diligence, has been unable to find a person who would have been a defendant in a civil action under 15 U.S.C. § 1125(d)(1)(A).

106. The registration and/or use of the Defendant Domain Names is a use in commerce.

107. The registration and/or use of the Defendant Domain Names affect BlackRock's ability to use its BlackRock Marks in commerce.

108. The Defendant Domain Names and their respective registrant(s) have no valid rights in the BlackRock Marks.

109. At the time the Defendant Domain Names were registered and/or used, the Defendant Domain Names and their respective registrant(s) were on actual and/or constructive notice, pursuant to Section 22 of the Lanham Act, 15 U.S.C. § 1072, of the existence of BlackRock's superior rights in its BlackRock Marks by reason of the existence, at that time, of BlackRock's aforementioned federal trademark rights.

110. Use by the Defendant Domain Names and their respective registrant(s) of the BlackRock Marks is without the permission or authorization of BlackRock.

111. The aforesaid registration and/or use of the Defendant Domain Names has caused and is likely to continue to cause confusion, mistake and/or deception among consumers and the public, leading the public falsely to believe that the Defendant Domain Names and/or websites provided thereunder are those of, are sponsored or approved by, or are in some way connected with BlackRock.

112. The aforesaid registration and/or use of the Defendant Domain Names constitutes direct infringement of BlackRock's trademark rights in violation of Section 32(1) of the Lanham Act, 15 U.S.C. § 1114(1).

113. The aforesaid acts have caused, and are causing, great and irreparable harm to BlackRock and the public. The harm to the public includes the potential for fraud stemming from impersonation of and/or misdirection from a financial institution. The harm to BlackRock includes harm to the value and goodwill associated with the BlackRock Marks. Money cannot fully compensate either of these harms. Unless permanently restrained and enjoined by this Court, said irreparable harm will continue.

PRAYER FOR RELIEF

WHEREFORE, BlackRock respectfully requests of this Court:

1. That judgment be entered in favor of BlackRock on its claims of cybersquatting and trademark infringement.
2. That the Court order the domain registries for the Defendant Domain Names to change the registrars for the Defendant Domain Names to BlackRock's registrar of choice and by such registrar's change of the registrant(s) to BlackRock.
3. That the registrar of any other domain names registered by the registrant(s) of the Defendant Domain Names that resemble or include the BlackRock Marks be replaced with BlackRock's registrar of choice and that such registrar change the registrant(s) to BlackRock.
4. That the Court order an award of costs and reasonable attorney's fees incurred by BlackRock in connection with this action pursuant to 15 U.S.C. § 1117(a); and
5. That the Court order an award to BlackRock of such other and further relief as the Court may deem just and proper.

Dated: November 5, 2024

By: /s/ Attison L. Barnes, III
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